

EXHIBIT 10

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**DECLARATION OF MATTEO
SALERNO ON BEHALF OF TRIGON
TRADING PTY LTD**

1 I, Matteo Salerno, declare as follows:

2 1. I am a representative of Trigon Trading Pty Ltd. (“Trigon”), Lead Plaintiff in the
3 above-captioned securities class action (the “Action”).¹

4 2. I am aware of and understand the requirements and responsibilities of a
5 representative plaintiff in a securities class action, including those set forth in the Private
6 Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §§ 78u-4; 77z-1. I have
7 personal knowledge of the matters set forth in this declaration, as I have been directly involved
8 in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to
9 the Settlement, and I could and would testify competently to these matters.

10 **I TRIGON’S OVERSIGHT OF THE LITIGATION**

11 3. The initial complaint in this Action was filed on November 26, 2017. ECF No. 1.
12 Trigon moved for Lead Plaintiff on January 25, 2018, and the Court appointed another party
13 Lead on March 16, 2018. (I understand that Trigon’s counsel, Block & Leviton, litigated a
14 Temporary Restraining Order in the *MacDonald v. Dynamic Ledger Solutions, Inc., et al.*,
15 docket, No. 3:17-cv-07095-RS (N.D. Cal.) in December 2017.) Thereafter, Trigon filed an action
16 in California Superior Court related to this matter. This Court substituted Trigon as Lead
17 Plaintiff in this Action on April 8, 2019, and Trigon’s California Superior Court action was
18 subsequently dismissed. Since April 2019, Trigon has served as sole Lead Plaintiff in this action.

19 4. In fulfillment of my responsibilities on behalf of all class members in this Action,
20 I have worked closely with Block & Leviton LLP regarding all aspects of the litigation and
21 resolution of this case.

22 5. Throughout the litigation, I received periodic status reports from Block & Leviton
23 (most regularly from Jacob A. Walker) on case developments and participated in regular
24 discussions concerning the prosecution of the Action, the strengths and risks to the claims, and
25 potential settlement. In particular, throughout the course of this Action, I: (a) reviewed relevant
26 documents; (b) stayed apprised of developments of the case and made myself available to Block

27
28 ¹ Unless otherwise indicated, capitalized terms shall have the meaning ascribed to them in the
Stipulation and in Lead Plaintiff’s Notice of Motion, Motion for Preliminary Approval of
Settlement, and Memorandum of Points and Authorities in Support Thereof. ECF No. 246.

1 & Leviton; (c) provided Block & Leviton with extensive information and materials regarding my
2 investments; (d) conferred with Block & Leviton throughout the litigation; (e) provided
3 documents and responses to interrogatories during the discovery process; (f) consulted with my
4 attorneys regarding settlement negotiations; and (h) evaluated and approved the proposed
5 Settlement.

6 **II. APPROVAL OF THE SETTLEMENT**

7 6. Through my active participation, I was kept informed of the progress of the
8 settlement negotiations in this litigation. Both before and after the mediation process presided
9 over by the Hon. Layn Phillips, I conferred with my attorneys' regarding the parties' respective
10 positions.

11 7. Based on my involvement throughout the prosecution and resolution of the claims
12 asserted in the Action and the advice of my counsel, I believe that the Settlement provides an
13 excellent recovery for the Settlement Class, particularly in light of the risks of continued
14 litigation. Thus, I believe that the proposed Settlement is fair, reasonable, and adequate to the
15 Settlement Class and I strongly endorse approval of the Settlement by the Court.

16 8. I believe that the request for an award of attorneys' fees in the amount of one-
17 third of the Settlement Fund is fair and reasonable in light of the work performed by counsel on
18 behalf of the Settlement Class. I have evaluated this fee request by considering the work
19 performed, the recovery obtained for the Settlement Class, and the risks of the Action, and have
20 authorized this fee request for the Court's ultimate determination.

21 9. I further believe that the litigation expenses being requested for reimbursement to
22 counsel are reasonable, and represent costs and expenses necessary for the prosecution and
23 resolution of the claims in the Action. Based on the foregoing, and consistent with my obligation
24 to the Settlement Class to obtain the best result at the most efficient cost, I fully support the
25 motion for an award of attorneys' fees and reimbursement of litigation expenses.

26 10. Trigon devoted significant time to the representation of the Settlement Class in
27 this Action, which was time that Trigon's representatives otherwise would have spent at their job
28 or engaged on other activities and, thus, represented a cost to Trigon. Trigon's representatives,

1 including me devoted at least 250 hours in the litigation-related activities described above.

2 11. In addition, Trigon incurred actual expenses for teleconferences, copying,
3 printing, and shipping, in the amount of \$668.35 Australian Dollars (approximately \$475 USD),
4 which have not yet been reimbursed.

5
6 I declare under penalty of perjury of the laws of the United States of America that the foregoing
7 is true and correct to the best of my knowledge.

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9 Executed on 07 / 28 / 2020 at Matteo T Salerno, Australia.

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14 Matteo Salerno
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